

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 10

**Conference Room Document 3
(English, French and Spanish)**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

**Thirty- third Session
Washington D.C., U.S.A., October 23 – 28, 2000**

WORKING PAPER ON THE USE OF THE HACCP SYSTEM IN SMALL AND/OR LESS DEVELOPED BUSINESSES (SLDBs) COMMENTS FROM PERU

After analyzing document CX/FH 00/10, we observed that the new version does not substantially modify the HACCP System standard approved in the 22nd Session of the Codex Alimentarius Commission. The new version resolves the limitations of SLDBs, through the possibility of their use of Expert Consultants, which is already contemplated in the HACCP System Standard currently in force.

We believe that the SLDBs in developing countries are at a disadvantage compared to those in developed countries that have more resources to overcome the limitations existing in these businesses. The FAO and WHO should concentrate their efforts in the consulting and training of SLDBs in developing countries, to rapidly promote the adoption of the *General Principles of Food Hygiene*, the HACCP System and the specific Codes of Practice for foods.

Similarly, the FAO and WHO should consider negotiating with international financial bodies, so that when dealing with the financing of the SLDBs, above all those in developing countries, the credit package would incorporate health aspects oriented at guaranteeing at least a physical structure and condition of the establishments that would facilitate food hygiene.

In our country, the government is making great efforts toward the modernization of Surveillance and Testing Programs and has made the application of the HACCP System mandatory as a method of self-regulation for the Food Industry, nevertheless, due to the difficulties that SLDBs encounter in the implementation of HACCP, they have been excepted from this obligation and will be subject to specific health legislation for their progressive incorporation into the HACCP System.

Specific comments on the Annex B revised guidelines GUIDELINES FOR THE APPLICATION OF THE HACCP SYSTEM

We are in agreement with the proposed paragraphs and modifications.

APPLICATION

1. Assembly of an HACCP team

In the first paragraph, the underlined modification should read as follows:

for example regulatory authorities, industrial and trade associations and independent experts and it is recommended that the reference works on the HACCP system be reviewed, as well as the sector's own guidelines, in particular for SLDBs.

2. Product Description

The modified, underlined paragraph should read as follows:

In multi-product businesses, such as for example, catering operations it could be useful to focus on groups of products with similar characteristics or processing steps or that are used for similar products.

5. On Site Confirmation of the Flow Diagram

The modified paragraph could read as follows:

The confirmation of the flow diagram should be performed by the HACCP team or by a person with sufficient knowledge of the development of activities.

6. List all possible hazards.....

The first paragraph could read as follows:

The HACCP team (see also point 1) or expert (especially for SLDBs) should list all the hazards that could reasonably be foreseen to be produced in each phase.

8. Establishment of critical limits for each CCP

The second modified and underlined paragraph could read as follows:

Guidance provided by experts on the HACCP system may assist companies, particularly small and less developed businesses, to identify the most appropriate criteria for critical limits and may as well establish these same limits, taking into consideration the provisions and standards that apply to their product or activity.

Vigilance is needed to ensure that the limits are completely applicable to the specific operation or product in question. Critical limits should be measurable.

9. Establishment of a surveillance system for each CCP

The modified and underlined paragraph could read as follows:

The effectiveness of the surveillance system will depend on the knowledge and competency of the management and the workers, particularly in those businesses in which the surveillance procedures are conducted manually. Specific needs should be identified and training provided to the workers for this surveillance.